



County of San Diego

GARY W. ERBECK
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION

P.O. BOX 129261, SAN DIEGO, CA 92112-9261
(619) 338-2222 FAX (619) 338-2377
1-800-253-9933

RICHARD HAAS
ASSISTANT DIRECTOR

15 July 2003

John H. Robertus, Executive Officer
Attn: Chiara Clemente
California Regional Water Quality Control Board, Region 9
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Re: Comments for Order No. R9-2003-0155, NPDES Permit CA0109347 Waste Discharge Requirements for USMC Camp Pendleton Discharge to the Pacific Ocean via the Oceanside Ocean Outfall

Dear Sir:

The Department of Environmental Health (DEH) is the local agency responsible for the protection of public health in ocean recreational waters. DEH often uses data from other agencies' beach water (aka 'surf zone') monitoring to ensure that ocean water quality meets state standards for body contact (California Health & Safety Code 115880). When monitoring indicates water quality does not meet state standards or if a release of untreated sewage may impact ocean waters, DEH makes notifications to protect public health.

With respect to section IV. Receiving Water Monitoring, Order No. R9-2003-0155, DEH has the following comments:

1. In section A. "Surf Zone Water Quality Monitoring", sampling frequency during the winter is "once every other week from November 1 through April 30 of each year." DEH recommends this frequency be changed to "a minimum frequency of once per week" due to year round recreational use of ocean waters in Oceanside.
2. The opening paragraph of this section states, "Monitoring must reflect conditions during all critical environmental periods." DEH has received and reviewed bacterial indicator data for over 3000 surf zone samples in San Diego County per year since 1999. Based upon this experience and knowledge of conditions that affect beach water quality DEH has developed S.O.P.s for surf zone sample collection that should provide representative samples for most critical environmental periods and be most protective of public health. Until new

developments in science and bacterial indicator methodology become available to enhance our knowledge of temporal and spatial variability of indicators and their relationship with pathogens, DEH recommends using the "STANDARD OPERATING PROCEDURES FOR THE COLLECTION OF WATER SAMPLES FOR BACTERIAL ANALYSIS FROM AND OCEAN AND BAY RECEIVING WATERS" attached herein.

If you have any questions, please call me at (619) 338-2201 or Clay Clifton at (619) 338-2386.

Sincerely,

JACK MILLER, Chief
Land and Water Quality Division

JM:cc

Enclosures (1)

STANDARD OPERATING PROCEDURES FOR THE COLLECTION OF WATER SAMPLES FOR
BACTERIAL ANALYSIS FROM AND OCEAN AND BAY RECEIVING WATERS